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11 *Attorneys for Defendant*
12 CITY OF HENDERSON

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 KELLY WOODBURN, THOMAS
WOODBURN, and JOSHUA
16 RODRIGUEZ, individually and on behalf
of all others similarly situated,

17 Plaintiffs,

18 vs.

19 CITY OF HENDERSON; DOES I through
20 V, inclusive; and ROE CORPORATIONS
I through V, inclusive,

21 Defendants.

Case No. 2:19-cv-01488-CDS-VCF

**STIPULATION AND PROPOSED ORDER TO
CONTINUE DATE OF HEARING ON
DEFENDANT'S MOTION TO COMPEL
DISCOVERY RESPONSES (ECF NO. 166)
AND DEFENDANT'S MOTION FOR LEAVE
TO FILE EXCESS PAGES (ECF NO. 168)
(FIRST REQUEST)**

1 Plaintiffs Kelly Woodburn, Thomas Woodburn, and Joshua Rodriguez (“Plaintiffs”) and
2 Defendant CITY OF HENDERSON (“Defendant”), by and through their respective attorneys of
3 record, hereby stipulate and agree to continue the date for the hearing on Defendant’s Motion to
4 Compel Discovery Responses (ECF No. 166) and Motion for Leave to File Excess Pages (ECF No.
5 168) currently scheduled for April 26, 2023, at 2:00 p.m.

6 The parties request a continued date for the hearing because counsel for Plaintiffs, Brian
7 Blankenship, is taking a deposition in another lawsuit on April 26, 2023, which cannot be rescheduled.
8 Furthermore, other attorneys at Plaintiffs’ representative law firm, Claggett & Sykes, are also
9 unavailable as they are participating in depositions on the afternoon of April 26, 2023.

10 Accordingly, the Parties propose that the hearing be continued to the following **Wednesday,**
11 **May 3, 2023.** Alternatively, should this requested date not fit within the Court’s schedule, the Parties
12 propose the following alternative dates and times: May 5, 2023, May 9, 2023, or May 11, 2023.

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1 This extension is sought in good faith and not for the purpose of undue delay.

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3 Dated: April 21, 2023

Dated: April 21, 2023

4 CLAGGETT & SYKES LAW FIRM

LITTLER MENDELSON, P.C.

5 By: /s/ Brian Blankenship
6 SEAN K. CLAGGETT, ESQ.
7 BRIAN BLANKENSHIP, ESQ.
8 SCOTT E. LUNDY, ESQ.

By: /s/ Emil S. Kim
MONTGOMERY Y. PAEK, ESQ.
ETHAN D. THOMAS, ESQ.
EMIL S. KIM, ESQ.
ANDREW S. CLARK, ESQ.

8 *Attorneys for Plaintiffs*
9 KELLY WOODBURN, THOMAS
10 WOODBURN, AND JOSHUA
11 RODRIGUEZ

Attorneys for Defendant
CITY OF HENDERSON

12 **ORDER**

13 The hearing scheduled for April 26, 2023,
14 is VACATED and rescheduled to 10:00
15 AM, May 9, 2023.

IT IS SO ORDERED.

Dated: April 24
_____, 2023.



UNITED STATES MAGISTRATE JUDGE

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